VIA ELECTRONIC SUBMISSION

December 3, 2003

Chairman Michael K. Powell
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Dear Chairman Powell:

It was a pleasure seeing you at this week's FCC's VoIP Forum, and once again, thank you for inviting me to participate. I wanted to take the opportunity, following the Forum, to explain my position on another important avenue for broadband access, and the potential it holds for VoIP.

As I mentioned in my comments yesterday, over the past few years, more than twenty million US homes have joined the "Always On" revolution, helped in large part by forward looking policies put in place by the Federal Communications Commission (FCC). This has happened as Internet connectivity/access has become available at competitive prices via DSL and cable modems in many US markets. Consumers are now about to benefit from yet another broadband platform, broadband over powerlines (BPL), which is poised to compete with DSL and cable, bringing even more competition, lower prices, and better services to the growing "Always On" revolution.

As the FCC proceeds with its Notice of Inquiry (NOI) regarding BPL technology, it must strive, as it does in any proceeding that considers new technologies, to understand both the tremendous benefits of BPL to competitive broadband access, IP voice services and to critical infrastructure, as well as the potential risks to existing licensed users. And while BPL systems may differ, all potential BPL competitors should be subject to the same FCC emission limits and interference protections that would govern any new unlicensed technology.

As one of the earliest innovators and advocates for IP communications (also known as VoIP), BPL represents an important opportunity in bringing the benefits of broadband to consumers, including providing a real alternative to traditional phone service from the local telephone company. As a ham radio operator, I also understand that the American Radio Relay League (ARRL) has raised some concerns that BPL technology may cause harmful interference in the amateur radio bands.

While I cannot speak to all BPL technology, I am familiar with one BPL technology, provided by Current Technologies, that provides a safe, commercially viable transformer-bypass solution that will truly transform the electric distribution network into a broadband communications platform. Current has resolved transmission issues over both low voltage and medium voltage electric distribution lines and has taken the steps

necessary to make sure that its technology will not interfere with the ham radio operators living in the areas around their deployments. Additionally, Current's BPL system leverages the widely accepted HomePlug® standard for powerline communications. My colleagues at ARRL have already recognized HomePlug® as safe to the amateur radio bands.

The Current solution is capable of providing multi-megabit speeds for residential and commercial Internet access users and supports various IP applications, with every outlet broadband enabled, and no truck roll to the customer required. This kind of "always on" connection will catapult the demand for IP applications like VoIP, which remains the holy grail for broadband. And as more and more consumers obtain affordable, accessible broadband access, the IP revolution that we all desire – policymakers and consumers alike – will truly arrive on our doorsteps.

Thank you for your consideration, and I look forward to working with you on making IP Communications a reality for all Americans.

Very truly yours,

Jeff Pulver

President

Pulver.com